

Exhibit C

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2
3 UNITED STATES DISTRICT COURT
4 NORTHERN DISTRICT OF CALIFORNIA
5 SAN FRANCISCO DIVISION

6 IN RE: UBER TECHNOLOGIES, INC.,
7 PASSENGER SEXUAL ASSAULT
8 LITIGATION

MDL No. 3084 CRB

**[PROPOSED] AMENDED ORDER TO SHOW
CAUSE WHY PLAINTIFFS IN EXHIBIT A1
WHO HAVE SUBMITTED NON-BONA FIDE
RIDE RECEIPTS SHOULD NOT BE
DISMISSED WITH PREJUDICE**

9 This Document Relates to:
10 ALL ACTIONS

Judge: Honorable Charles R. Breyer

11
12 **[PROPOSED] AMENDED ORDER**

13 Having considered Uber’s Motion for Entry of an Order to Show Cause Why 7 Plaintiffs Who
14 Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with Prejudice, the Court hereby
15 GRANTS the motion.

16 The Court’s Pretrial Order No. 5 required Plaintiffs to provide “a bona fide ride receipt from
17 an Uber trip connected to the alleged incident[.]” ECF 175, ¶ 4.

18 The 7 Plaintiffs listed in Exhibit A1 of the Motion have submitted non-bona fide receipts.

19 The Ninth Circuit has recognized that dismissal of claims is warranted under Federal Rule of
20 Civil Procedure 37 where a party “willfully, deliberately, and intentionally submitted false documents
21 to support apparently untenable claims and defenses.” *Pro. Seminar Consultants, Inc. v. Sino Am.*
22 *Tech. Exch. Council, Inc.*, 727 F.2d 1470, 1472, 1474 (9th Cir. 1984). Courts may also impose
23 sanctions as part of their “inherent power to control their dockets,” including their “inherent power to
24 dismiss an action when a party has willfully deceived the court[.]” *Thompson v. Hous. Auth. of City of*
25 *Los Angeles*, 782 F.2d 829, 831 (9th Cir. 1986); *Wyle v. R.J. Reynolds Indus., Inc.*, 709 F.2d 585, 589
26 (9th Cir. 1983).

27 Accordingly, the 7 Plaintiffs listed in Exhibit A1 are hereby ORDERED TO SHOW CAUSE
28 why their claims should not be dismissed with prejudice. The Plaintiffs shall file a written response

1 no later than [_____]. The response must specifically address the factual and legal basis for the
2 submission of the non-bona fide receipts and why the conduct does not warrant dismissal under the
3 Court's inherent powers.

4 The Court orders Plaintiffs with MDL IDS 3621, 3962, and 3666 to submit within 30 days to
5 a deposition not to exceed 3 hours regarding how the Plaintiffs became involved in the litigation, how
6 the fraudulent receipt was generated and distributed, and who else was involved in or aware of the
7 fraud at issue here.

8
9 **IT IS SO ORDERED.**

10
11
12 Dated: _____, 2025

HON. CHARLES R. BREYER
United States District Court Judge

EXHIBIT A1

MDL ID	Law Firm
3666	Pulaski Law Firm, PLLC
3699	Pulaski Law Firm, PLLC
3787	Pulaski Law Firm, PLLC
3877	Reich and Binstock, LLP
3921	Peiffer Wolf Carr Kane Conway & Wise
3962	Reich and Binstock, LLP
3977	Reich and Binstock, LLP